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January 25, 2001

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FCC MAIL ROOM

Chairman Powell  
Commissioner Furchgott-Roth  
Commissioner Ness  
Commissioner Tristani  
Federal Communications Commission  
455 12<sup>th</sup> St., SW  
Washington, D.C. 20554

RE: FCC 00-455, ET Docket No. 00-258, RM-9920 and 9911

Dear Commissioners:

As the FCC Commission moves forward in issuing a ruling on the planned usage of the 2500-2690 MHz band currently used by Instructional Television Fixed Service (ITFS) and Multipoint Distribution Service (MDS), input from the K-12 educational institutions concerning the effect of the ruling on their delivery of instructional support merits serious attention when considering the impact on learning for America's youth. The question is not of students losing instruction, but of the quality and depth that would be lost. Consistently, our nation's leaders indicate the need for OUR youth to compete in a global world, yet decisions based on "riding the 3G tide" could remove the quality tools that support the technological advancement of America's youth.

Long Beach Unified School District has been licensed on the ITFS D group for 30 years. Yet, limited access to technologically advanced infrastructures and multimedia delivery systems has stymied the capacity of the K-12 arena to actively address distance learning until the fortuitous passage of eRate in 1994 and the leasing of our excess capacity in 1997. In the last four years these funding changes have enabled LBUSD to set up a microwave closed circuit delivery system to approximately 94 schools/sites and local cable, purchase a broadcast van to increase quality and quantity of taped events disseminated in local schools and community, revamp programming on the local channels, and increase the hours for local viewing.

It is important that the Commission not view educational institutions historical usage of the ITFS bands as a determinant for deciding frequency allocation of ITFS. Massive strides have been achieved in the past four to five years, but unlike commercial ventures, education has the weight of "accountability" for its actions. Distance learning must take into account the audience (which students), assessment of learning, and delivery of effective instructional strategies. Multimedia can advance and support learning if it "connects" the student to the world, but only if **education** is allowed time for a "learning curve" since we have only recently been allowed entrance to the technological arena.

Relocating ITFS to a higher frequency is asking educational institutions with their technological naivete to become instant experts in troubleshooting new frequencies in an attempt to provide the same quality. Our concern is that you have opened the window of digital technology to our learning institutions and now intend to retract this access and put us back into the analog world. How can our

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students' needs compete with the money the government is being offered by free enterprise? President Bush indicates that education is a priority, but the commission is assessing whether to remove some of the very technological underpinnings that will enable our students to compete in this global world.

In addition, those of us who have leased our excess capacity are in danger of losing these leases, because reallocation of frequencies would change the value of the commodity. This funding has greatly increased our capacity to move forward in multimedia delivery of instruction. We have only begun to dream of two-way multimedia projects for distance learning; yet distance education for our English Language Learning parents and advanced placement classes for students are in our near future. If digital, two-way communication is the goal of 3G, my query is why would you want less for America's youth?

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Grubb", written over a horizontal line.

Kathleen Grubb, Ed.D.  
Assistant Director

Publication Authorized:  
Christopher J. Steinhauser  
Deputy Superintendent